

OSHA Interpretation: Beards and Tight-Fitting Respirators

HPPOS-116

PDR-9111210272

Title: OSHA Interpretation: Beards and Tight-Fitting Respirators

See the memorandum from R. L. Baer to R. R. Bellamy (and others) dated November 2, 1984. OSHA's position is that no bearded individual can achieve a consistent and satisfactory fit when any tight-fitting respirator is worn. Qualitative fit tests are highly subjective and errors with this type of testing are generally high. HPPOS-094 contains a related topic.

In response to a request by Region III for technical assistance in April 1983, OIE issued a memorandum providing a broad technical basis to support the position for prohibiting bearded users from wearing SCBA's. However, at that time, a strict legal reading of NRC regulations led to the conclusion that as long as no respirator protection factor was assumed, a bearded individual could not be prohibited from wearing a respirator.

The controversy over bearded fire brigade members at a Region III facility continued and an OSHA written interpretation on the subject surfaced (see enclosures to memorandum). This OSHA interpretation is clear and direct - OSHA's 29 CFR 1910.134 (e) (5) (i) prohibits facial hair in the seal area. It is also OSHA's position that:

1. The employer is in violation of the standard if employees are allowed to wear respirators over facial hair at the sealing surface of the respirator.
2. Qualitative fit tests are highly subjective and the errors associated with this type of testing are generally high.
3. Based on the information available, no bearded individual can achieve a consistent and satisfactory fit when any tight-fitting respirator is worn.

OIE recommends that if recalcitrant licensees continue to allow bearded Emergency Response / fire brigade individuals

to wear tight-fitting respirators after being informed of OSHA's interpretation and position, the region should refer this nonradiological respiratory problem to the appropriate OSHA authorities, in accordance with Chapter 1007 of the IE Manual (Interfacing Activities Between Regional Offices and OSHA).

By separate correspondence to RES, we plan to recommend RES change the regulations to expressly forbid facial hair in the seal area of tight-fitting respirators.

Regulatory references: 10 CFR 20.103, 10 CFR 20.1703

Subject codes: 8.10, 12.13

Applicability: All